

Question 9:

QSR Group LLC (“QSR”) desires streamlined processing pursuant to Section 63.12 of the Commission's rules. QSR qualifies for streamlined processing under Section 63.12(c)(1)(ii) because although QSR is affiliated with a foreign carrier in a destination market, QSR qualifies for a presumption of non-dominance under Section 63.10(a)(3). As more fully described in response to Question 11 below, QSR qualifies for a presumption of non-dominance under Section 63.10(a)(3) because the foreign carrier with which QSR is affiliated is not a monopoly provider and does not have more than 50% of the market share for international transport or local access on the foreign end of the relevant routes.

The other restrictions set forth in Section 63.12(c) of the Commission's rules do not apply. QSR does not have an affiliation with a dominant U.S. carrier whose international switched or private line services the applicant seeks authority to resell. And QSR does not seek authority to provide switched basic services over private lines to a country for which the Commission has not previously authorized the provision of switched services over private lines.

Question 11:

**63.18(i)** – QSR hereby certifies that it is affiliated with QSR Systems PTE. LTD. (“QSPL”), a corporation formed under the laws of Singapore, because QSR is 100% owned by QSPL.

**63.18(j)** – QSR hereby certifies that it seeks to provide international telecommunications services to Singapore, where its foreign carrier affiliate QSPL provides services.

**63.18(k)** – Singapore is a member of the WTO. In addition, QSPL lacks market power in Singapore. QSPL has less than 1% of the market for telecommunications services and access lines in Singapore.

**63.18(l)** – QSR desires the authority to resell the international switched services of an unaffiliated U.S. carrier on the routes to Singapore. Accordingly, pursuant to Section 63.10(a)(3), QSR hereby certifies that QSPL is not a monopoly provider in Singapore. QSR further submits the following information to demonstrate that QSPL does not have sufficient market power on the foreign end of the routes to the countries specified above to adversely affect competition in the U.S. market: QSPL has less than 1% of the market for telecommunications services and access lines in Singapore.

**63.18(m)** – QSR desires to be classified as non-dominant. QSR submits that the information set forth above for Section 63.18(l) demonstrates that it is presumptively non-dominant under Section 63.10(a)(3) of the Commission’s Rules.

Question 12:

As described above, QSR desires to be authorized to provide international telecommunications services to, among other countries, Singapore, where it has a foreign carrier affiliation as described above.

Question 15:

- (d) QSR has not received authority previously under Section 214 of the Communications Act.
- (e) QSR certifies that it will comply with the terms and conditions contained in sections 63.21, 63.22 and 63.23 of the Commission's rules.
- (f) At this time, QSR seeks no other authorization available under Section 63.18(e).
- (g) Not applicable.